

Idaho WIOA State Plan – Section VI - Program-Specific Requirements

Adult, Dislocated Worker, and Youth Programs Activities under Title I-B

(a) General Requirements

(1) Regions and Local Workforce Development Areas

(A) Regions and Local Areas

Identify the regions and the local workforce development areas designated in the State.

See answer under (B) below.

(B) Process for Designation of Local Areas and Regions

Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

Idaho is identified as a single statewide planning region, consisting of the two former WIA local areas – Balance of State and East-Central District.

Following the adoption of the WIOA local area designation policy and policy for appointment of local board members, the two former WIA local areas were initially designated through June 30, 2017. Both local areas met the policy criteria for “performed successfully” and “sustained fiscal integrity” as defined below.

Performed Successfully - Met or exceeded the negotiated levels of performance for the last two consecutive program years.

Sustained Fiscal Integrity – The Secretary of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area mis-expended funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the determination

After the initial designation of the local areas, a policy for identification of regions was developed. All policies were approved by the State Workforce Development Council, acting as both the state and local boards, and the Governor’s office. Before adoption of the policies, they were posted for public comment on the Idaho Department of Labor website for a minimum of 30 days. The Workforce Development Council staff also worked with the Idaho Association of Cities to ensure that all Idaho mayors and county clerks received direct notice of the policies and opportunity to comment. **No comments were received.**

(C) Appeals Process - Designation

Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas.

APPEALS - WIOA Section 106(b)(5)

DENIAL OF LOCAL AREA DESIGNATION

A unit of general local government that requests but is not granted designation as a local Workforce Investment area under section 106 (b) (2) or (3) may submit an appeal to the State Workforce Development Council.

All such appeals shall be in writing and be filed within twenty (20) calendar days of the date the denial letter was mailed by the Governor or the Governor’s designee. The appeal must include all factual and legal

arguments as to why the appeal should be granted. The appeal shall be filed with the Chair of the Governor's Workforce Development Council, Idaho Department of Labor, Workforce Development Division, 317 West Main Street, Boise, Idaho 83735. The Chair of the Council, or the Chair's designee, shall promptly acknowledge receipt of the appeal.

The existing designated workforce areas will continue while the appeal is in progress and will be modified should the initial denial of designation be overturned.

(a) Appeal to the State Workforce Development Council

The appeal shall be deemed timely filed if it is received by the Chair of the Workforce Development Council within the 20-day period, unless the appeal is filed by mail, in which case the official postmark affixed by the U. S. Postal Service shall be deemed to be the date of filing. Any appeal that is filed late shall be summarily dismissed.

The Chair of the Council will select a hearing officer. The appeal shall be heard by the hearing officer not more than thirty (30) days after the appeal was filed. With the consent of the appealing party, the hearing may be held after the 30-day period, but in no case shall the hearing be conducted more than sixty (60) days after the appeal was filed.

The hearing officer shall inform the appellant of the date, time and place of the hearing by written notice mailed at least ten (10) calendar days in advance. The appellant shall have the right to present testimony and documentary evidence, to offer evidence in rebuttal, to present oral argument and to be represented by legal counsel. All testimony received by the hearing officer shall be under oath or affirmation. If the appellant retains legal counsel, federal WIOA funds cannot be used for remuneration.

An appellant must establish that it is entitled to designation as a local area according to this policy.

Within fifteen (15) days of the hearing, the hearing officer shall issue a recommended decision, which shall include findings of fact, recommendations and the basis therefore. That decision shall be mailed to the appealing party. The hearing officer shall file a copy of the recommended decision with the Chair of the Council.

The recommended decision of the hearing officer shall be placed on the agenda of the next Council meeting for disposition; however, if no Council meeting is scheduled within forty-five (45) days of the date the decision was issued, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within that 45-day period to accept, reject or modify the hearing officer's recommended decision.

In its deliberations, the Council shall consider only the evidence presented to the hearing officer. The Council shall not receive or consider any evidence not presented to the hearing officer. The decision of the Council shall be reduced to writing and be mailed to the Governor and the appealing party. The decision must set out in summary fashion the Council's findings and conclusions. The Council may adopt, in whole or in part, the findings of fact, recommendations and rationale of the hearing officer.

(b) Appeal to USDOL

If a timely appeal of the decision does not result in the requested designation, the unit of general local government or grant recipient may further appeal the designation decision to the U.S. Secretary of Labor within thirty (30) days after receipt of the Council's written decision. The appeal to the Secretary must be consistent with the requirements of the Workforce Innovation and Opportunity Act. The Secretary, after receiving a request for review and upon determining that the entity has met the burden of establishing that it was not accorded procedural rights under the appeal process established in the state plan, or that the area

meets the requirements of Section 106(b) paragraph (2) or (3) and 20 CFR 679.250, as appropriate, may require that the area be designated as a local area. As part of this determination, the Secretary may consider comments submitted by the Council in response to the appeal.

Appeals made to the Secretary must be filed no later than 30 days after receipt of written notification of the denial from the Council, and must be submitted by certified mail, return receipt requested, to:

Secretary
U.S. Department of Labor
Attention: ASET
200 Constitution Ave NW,
Washington, DC 20210,

A copy of the appeal must also be simultaneously provided to the State Council, submitted to:

Workforce Development Council
Idaho Department of Labor
Workforce Development Division
317 West Main Street
Boise, Idaho 83735

The Secretary will notify the Governor and the appellant in writing of the Secretary's decision within 45 days after receipt of the appeal. In making this determination the Secretary may consider any comments submitted by the Governor in response to the appeals.

(D) Appeals Process - Infrastructure

Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.

To be determined. The Governor will establish a process for a required One-Stop partner to appeal a determination regarding the portion of funds to be provided to support the One-Stop infrastructure. This appeals process will be in place by May 2016.

(2) Statewide Activities

(A) State Policies and Funds

Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

Idaho's workforce investment activities are not supplemented by state funds. State policies and guidance for the federally funded WIOA programs are provided to the One-Stop centers through Technical Assistance Guides, which are located on the Idaho Department of Labor's website at <http://labor.idaho.gov/dnn/wia/WorkforceProfessionals/TechnicalAssistanceGuides.aspx>.

(B) Governor's Set-Aside and Rapid Response

Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.

GOVERNOR'S FUND 10% SET-ASIDE PLANS

WIOA Title IB funds reserved for state level activities will be used to support the following:

- Rapid Response activities for dislocated workers;
- Disseminating by various means:
 - The State list of eligible providers of training for adults, dislocated workers and youth, including performance, tuition/fees and attendance cost information;
 - Information identifying eligible providers of work-based training opportunities;
 - Information on effective outreach and partnerships with business and service delivery strategies and promising practices to serve workers and job seekers;
 - Information of physical/programmatic accessibility for individuals w/disabilities;
- Conducting evaluations (*No longer waived*);
- Providing technical assistance to local areas in carrying out state plan activities, including coordination and alignment of data systems in support of this Act;
- Assisting various entities provide opportunities for individuals with barriers to employment to enter in-demand industry sectors or occupations and nontraditional occupations, and the development of exemplary program activities.
- Assisting local areas for carrying out the regional planning and service delivery efforts;
- Assisting local areas by providing information on and support for the effective development, convening, and implementation of industry and sector partnerships;
- Providing technical assistance to local areas that fail to meet performance accountability measure;
- Carrying out monitoring and oversight of activities for services to youth, adults, and dislocated workers;
- Providing additional assistance to local areas that have a high concentration of eligible youth (*No longer waived*); and
- Operating a fiscal and management accountability information system.

Dissemination of Information

The State will use approximately \$100,000 in funding as needed to meet this statutory requirement which includes: eligible providers, outreach, service delivery strategies, accessibility and workforce information. The state's current eligible training provider process will need to be modified to comply with increased regulations.

Assisting in the Operation of the One Stop System

The State will make available up to \$27,450 of state funds to assist in the operation of the One Stop system. This includes staff development, technical assistance and local area development.

High-Concentration of Youth

The State is reserving \$100,000 to be used to serve high concentrations of youth throughout the state. Funds will be distributed based on a council approved methodology to those areas demonstrating a need for additional monies.

Fiscal and Program Management

The State is reserving approximately \$600,000 to pay for the costs of state administration and program functions and to support the costs of the shared state-local systems including the statewide MIS and FMIS systems, monitoring, data validation and program evaluations.

Optional activities

As part of the provision of optional activities, the State will incorporate WIOA's share of Workforce Development Council costs to support its activities. In addition, workforce information system (America's Job Link) costs will also be attributed to this category. In total, the State proposes expending \$71,667 in optional

activity costs. Any additional funding available will be directed to ensure adequate monies to support required activities and those allowable activities the council seeks to support.

2. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers

RAPID RESPONSE ACTIVITIES

The Idaho Department of Labor's Workforce Division serves as the state Dislocated Worker Unit with responsibility for the coordination of Rapid Response/ Dislocated Worker/TAA services within the department and other state and local community resources. The department's Rapid Response activities involve and are closely coordinated with the Field Services Division, Benefits Bureau, Research and Analysis Bureau, Marketing and One-Stop offices. The department offers a comprehensive array of services including Wagner-Peyser, unemployment insurance, Trade Adjustment Assistance and veterans services. Rapid Response interventions, implemented by the department's Field Services Division and coordinated with the local One-Stop centers, incorporate them all in ensuring workers impacted by mass layoffs and closures are seamlessly transitioned to One-Stop activities. The department also coordinates closely with the state AFL-CIO and East-Central Idaho Planning and Development Association in arranging services for dislocations involving organized labor. These program representatives constitute the state's Rapid Response Team.

Local One-Stop Management staff is responsible for coordinating local workforce investment activities in conjunction with the state's Rapid Response efforts, including making WIOA Title I resources available to dislocated workers. The staff assists the state in promoting rapid response, early interventions services and Labor/Management Committees and helps to develop response plans to worker dislocations. The One-Stop staff also assists in coordinating services with local economic development efforts and the appropriate local elected officials. The extensive involvement of both One-Stop management and frontline staff in each early stage of Rapid Response intervention ensures that affected workers are seamlessly transitioned to One-Stop activities.

Employers covered by the Worker Adjustment and Retraining Notification Act must submit a notice of plant closures and mass layoffs to the Idaho Department of Labor, which in turn distributes the information to the department's division administrators and state agencies participating in the One-Stop system. The Workforce Division or local One-Stop management will promptly initiate onsite contact with the employer and the appropriate employee representatives to implement the most effective re-employment activities including financial management, job search assistance and other workshops as requested. If appropriate, fully automated onsite re-employment centers may also be established and staffed. Career and training services are presented as viable options for the workers.

Promoting early intervention to worker dislocations allows the Rapid Response Team to develop the appropriate service delivery strategy for the impacted workers. The response takes into account the impacted workers' skills through individual assessment, their potential for direct job placement and the availability of resources to address their short and long-term needs. Services include onsite information meetings on available employment and training programs, employee surveys, aggressive promotion of services and coordination with training providers.

Each year, the state sets aside a portion of the Title I Dislocated Worker funds (25%) to support Rapid Response. The funds are first prioritized for supplementing local WIOA Title I services and will support career and training services for the employees of the company. The second priority for funding is to support services for smaller dislocations where the Dislocated Worker Unit and local One-Stop staff agree that it is appropriate for the local area to take the lead in organizing the response. Funds are available for local areas lacking resources to meet the demand for services. The balance of Rapid Response funds not required to support the

above activities is allocated to local Dislocated Worker providers to supplement their area formula-fund allocations. Funds are allocated based on needs (support for carry-in participants and an increase in dislocations) and/or through the Dislocated Worker substate funding formula. Funds retained for Rapid Response activities at the state level may be allocated to local areas as they experience increased numbers of individuals in need of dislocated worker services due to layoffs or closures.

The Rapid Response Team also reviews and evaluates the potential for layoff prevention services. The goal of these efforts is to retain the business and to minimize downsizing. If appropriate, the team will present local economic development programs to identify layoff prevention options. These efforts include determining appropriateness of requesting assistance from the state's Workforce Development Training Fund.

The Idaho Department of Labor has years of experience providing Rapid Response services to our business community. Its proven track record is evident by its exemplary performance. Department staff take every opportunity to promote the full range of business services at each contact independent of the reason for that contact. This brings a comprehensive range of economic development, workforce development and education services to the attention of the businesses the department serves. Companies view these services as positive, proactive and business friendly.

The state's Management Information System currently provides integrated participant, financial and management reporting for WIOA Dislocated Worker, NDWG and TAA program activity. Tracking Rapid Response team activities continues on the intra-agency communications system.

(C) Disaster Coordination

In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

To be determined.

(D) Rapid Response and TAA

Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

WIOA Dislocated Worker and Trade Adjustment programs are both administered through the One-Stop centers. Since the inception of WIA and continued on with WIOA, any means of cost sharing has been emphasized to increase the impact of limited funds. In Idaho, the state-level Rapid Response team includes staff from the dislocated worker, UI and TAA units. When notified of any closure or mass layoff, including those notifications received via Worker Adjustment and Retraining Notification (WARN), the team quickly broadens to include local delivery staff with expertise in provision of Rapid Response, Title I-B Dislocated Worker, UI, TAA and Wagner-Peyser services. This state-local team communicates with the employer and employee representatives, determines if Trade related, assesses initial community impact, identifies and includes other partners for rapid response assistance and develops integrated service delivery schedules to meet the needs of each individual employer and the impacted workers. Informational packets, which include a survey to determine workers' interests and to use towards the development of a National Dislocated Worker Grant, are distributed to the impacted workers at the Rapid Response event. Team members work closely with service provider management staff to develop a service delivery plan that coordinates resources and ensures One-Stop access to information and enrollment in UI, TAA, WIOA and Wagner-Peyser, many times at the job site prior to dislocation and the filing of a Trade petition. Idaho's Rapid Response delivery system provides the

impacted worker with coordinated application and enrollment for WIOA, TAA and Wagner-Peyser services. Forms used for WIOA career assessment and retraining plans are accepted for the TAA program, eliminating client redundancies and streamlining co-enrollment processes. Although co-enrollment is not mandated, Rapid Response service delivery planning has ensured the majority of TAA recipients in Idaho are also being served with WIOA funds. The state requires co-enrollment of TAA recipients whenever they receive WIOA staff or other supportive services.

One-Stop TAA staff in Idaho have the background and experience to provide a comprehensive One-Stop assessment through their work with WIOA, ES, UI and TAA programs. Through the collection and analysis of participant information, staff can determine the best mix of services necessary for a TAA participant to obtain employment. Information areas may include an applicant's needs, strengths, support systems, education, job skills, interests and career objectives and current work search activities. Information may be gathered informally, via interviews or observations, or formally via assessment tools such as aptitude tests, computer assisted programs and interest inventories. Utilizing this information, these state-merit staff have the tools to guide participants in their work search and career development plans, which includes the option for occupational training through fulfillment of the required six criteria as allowed under TAA. Completing assessment activities for TAA participants eventually helps them “navigate” access to the appropriate One-Stop programs and services, as well as other community services.

(b) Adult and Dislocated Worker Program Requirements

(1) Alternative Training Models

If the State is utilizing alternative training models (e.g., on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State’s strategies for how these models ensure high quality training for both the participant and the employer.

On-the-job training (OJT) is training activity conducted by a private or public sector employer. This training occurs while the participant is engaged in productive work, learning the skills and information necessary for full and adequate performance on the job. OJTs are an attractive employer option for obtaining employees trained to their specifications, also helping the employees’ acquisition of transferrable skills to help them obtain employment later, should their current situation change. This effort also helps employers become more aware of the multitude of valuable resources offered by the state’s One-Stop Centers. This activity allows businesses to rapidly adapt to changes in technology and the marketplace, making them capable of expanding and remaining competitive with affordable OJT options uniquely designed to achieve their specific developmental goals, especially for small businesses looking to expand. The activity targets all individuals (Dislocated Workers, Adults and Youth) who are eligible for services under WIOA and may benefit from the availability of OJT options.

OJT Training contracts are directed at employers who are able to provide occupational skill training and full-time employment that leads to self-sufficiency for the participant. Employers must agree first to hire and then to train eligible WIOA/TAA participants. A training payment is provided to the employer to compensate for the extraordinary costs of training; extraordinary costs are those associated with workplace training and additional supervision. This includes those costs the employer has in training participants who may not yet have the knowledge or skills to obtain the job through an employer’s normal recruitment process.

The state emphasizes and coordinates learning-rich, work-based opportunities such as on-the-job training as a method to:

- Connect employers to the future workforce
- Expose participants, including youth, to quality employment opportunities, real-world experiences and to the skills (both technical and non-) required for success on the job.

In addition, OJTs

- Improve the state's capacity to market demand-driven services and build relationships with businesses;
- Increase employment opportunities for harder to serve individuals persons, such as the long term unemployed, older workers, and those with limited or sporadic job histories;
- Increase opportunities for the One-Stop system to enhance relationships with businesses;
- Increase percentages of employers hiring and retaining a skilled workforce;
- Increase number and percentages of workers trained and hired;
- Elevate skill proficiencies for workers that will result in increased worker viability;
- Increase responsiveness to labor market issues in the private sector; and
- Increase flexibility at the local level to offer businesses training solutions tailored to respond to the specific needs of the business.

(2) Registered Apprenticeship

Describe how the State will incorporate Registered Apprenticeship into its strategy and services.

Late in 2015, Idaho was one of six states selected by the US Department of Labor to participate in an apprenticeship initiative providing customized technical assistance support from experienced apprenticeship coaches. The State's apprenticeship development team, composed of workforce, apprenticeship, education, and other key partners, has been identified and will be taking full advantage of this opportunity in 2016 to support strategies to integrate apprenticeship as a sustainable solution under WIOA.

Initial strategies:

- Launch a renewed apprenticeship effort concentrating on one high growth occupation/industry; provide a positive model for expansion
- Pursue a local area focus first, then expand and strengthen to a statewide strategy
- Lean on USDOL technical assistance and Office of Apprenticeship for guidance, innovation and successful strategies from other states
- Integrate apprenticeships into Idaho's career pathways and industry sector strategies

(3) Training Provider Eligibility Procedure

Provide the procedure for determining training provider eligibility, including Registered Apprenticeship programs (WIOA Section 122).

IDAHO TRANSITION POLICY ALTERNATE CRITERIA FOR WIOA ELIGIBLE TRAINING PROVIDERS INITIAL AND CONTINUED ELIGIBILITY

Institution Criteria:

- Provide a certificate of registration or letter of exemption from the Office of the State Board of Education or other oversight body such as the Bureau of Occupational Licensing.
- Provide a copy of the institution's refund policy.
- Certify compliance with debarment and nondiscrimination policies.
- Certify compliance with EEO policy.
- Sign letter of intent to begin collecting required information for programs.

Program Criteria:

- Program of training leads to a high-growth/high-demand occupation with a minimum entry wage of \$10/hour. A list of such high-growth/high-demand occupations based on Idaho labor market information is found [here](http://labor.idaho.gov/WIOA/ETP_Occupations-2015.xlsx). http://labor.idaho.gov/WIOA/ETP_Occupations-2015.xlsx Note: WIOA participants will be encouraged to select training for an occupation that pays at least \$12/hour.

- Program of training provides a high quality experience, including leading to a recognized postsecondary credential.

High quality training experience may be identified by:

- Physical facilities and/or tools appropriate to meet instructional and skills assessment needs;
- Reportable skills gain measured by assessments;
- Industry endorsement;
- Not having a high dropout rate and/or high student loan default rate and/or poor job placement rate; and
- Preferably has regional or national accreditation.

Note: WIOA participants will be encouraged to select training that leads to an industry- recognized postsecondary credential.

IDAHO ELIGIBLE TRAINING PROVIDER LIST WIOA TRANSITION PROCEDURES BEGINNING OCTOBER 20, 2015

Initial Eligibility

- New providers and existing providers with programs of study not already on the Idaho Eligible Training Provider List may apply for Initial Eligibility.
- Approval is based on the institution and program criteria outlined above (Idaho Alternate Criteria for WIOA Transition Initial and Continued Eligibility).
- Letters of intent and accompanying information* will be collected until December 31, 2015. Upon receipt of the signed letter of intent, the Workforce Development Council may approve the institutions and programs for initial eligibility. After January 1, 2016, institutions will be required to execute a Memorandum of Understanding with the Idaho Department of Labor and when applicable the Office of the State Board of Education before the Workforce Development Council may approve the institution's programs.
- Initial eligibility will expire 1 year from date of approval.

Continued Eligibility

- Existing WIA Eligible Training Providers may apply for Continued Eligibility if their program is already on the ETP list: <http://labor.idaho.gov/wia1/allregion.xlsx>.
- Approval of programs will be subject to the institution and program criteria outlined above (Idaho Alternate Criteria for WIOA Transition Initial and Continued Eligibility).
- Letters of intent and accompanying information* will be due December 21, 2015 for existing WIA ETP providers to obtain continued eligibility under WIOA. Continued eligibility will be subject to renewal by January 1, 2017.
- Existing providers failing to submit requested information will be removed from the ETP list on January 2, 2016.

**Accompanying Information:*

- Certificate of registration or letter of exemption from the Office of the State Board of Education or other oversight body such as the Bureau of Occupational Licensing.
- Copy of the institution's refund policy.
- Signed Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion
- Signed Certification Regarding Nondiscrimination
- Signed WIOA Eligible Training Provider Payment Terms Acknowledgement

- List of programs to accompany the letter of intent.

Registered Apprenticeships – U.S. Department of Labor Registered Apprenticeship programs are automatically placed on the WIOA eligible training provider list upon request from the apprenticeship sponsor.

Out-of-State Providers – Out-of-state providers must be on their respective state’s WIOA eligible training provider list. Additionally, out-of-state providers must execute a Memorandum of Understanding for data sharing with the Idaho Department of Labor and, if applicable the Office of the State Board of Education.

(c) Youth Program Requirements

With respect to youth workforce investment activities authorized in section 129 of WIOA, -

(1) Criteria for Youth Grants

Identify the State-developed criteria to be used by local boards in awarding grants for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants.¹

To be determined. The youth council is currently in process of developing such criteria by January 2016.

(2) Youth Program Elements

Describe how the State will use funds to carry out Youth Program elements described in WIOA section 129(c)(2).²

To be determined. The youth council is currently in process of finalizing strategies by January 2016.

(3) Additional Assistance Criteria

Provide the language contained in the State policy for “requires additional assistance to complete and educational program, or to secure and hold employment” criterion specified in WIOA sections 129(a)(1)(B)(iii)(VIII) and 129(a)(1)(C)(iv)(VII).

To be determined. The youth council is currently in process of developing a definition by January 2016.

(4) Alternative Education Definition

Provide the State’s definition of “alternative education”.

ALTERNATIVE SECONDARY PROGRAMS (SECTION 33-1002; 33-1002C; 33-1002F, IDAHO CODE)

Alternative secondary programs are those that provide special instructional courses and offer special services to eligible at-risk youth to enable them to earn a high school diploma. Some designated differences must be established between the alternative school programs and the regular secondary school programs. Alternative secondary school programs will include course offerings, teacher/pupil ratios and evidence of teaching strategies that are clearly designed to serve at-risk youth as defined in this section. Alternative high school programs conducted during the regular school year will be located on a separate site from the regular high school facility or be scheduled at a time different from the regular school hours. (4-1-97)

https://www.sde.idaho.gov/site/alternative_schools/docs/Alternative%20School%20List%20by%20District.pdf

¹ Sec. 102(b)(2)(D)(i)(V)

² Sec. 102(b)(2)(D)(i)(I)

(5) State Definition for “Not attending school”

Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define “not attending school” or “attending school,” indicate that is the case.

IDAHO CODE 33-202. SCHOOL ATTENDANCE COMPULSORY.

The parent or guardian of any child resident in this state who has attained the age of seven (7) years at the time of the commencement of school in his district, but not the age of sixteen (16) years, shall cause the child to be instructed in subjects commonly and usually taught in the public schools of the state of Idaho. Unless the child is otherwise comparably instructed, the parent or guardian shall cause the child to attend a public, private or parochial school during a period in each year equal to that in which the public schools are in session; there to conform to the attendance policies and regulations established by the board of trustees, or other governing body, operating the school attended.

Other Idaho codes relating to school attendance:

Idaho Code 33-201. School Age.

Idaho Code 33-203. Dual Enrollment.

Idaho Code 33-206. Habitual truant defined.

Idaho Code 33-207. Proceedings Against Parents or Guardians.

Idaho Code 20-510. Information -- Investigation -- Petition.

(6) Basic Skills Deficient Definition

If utilizing the portion of the basic skills deficient definition contained in WIOA Section 3(5)(B), include the specific State definition.

Using statutory definition from WIOA Section 3(5)(A) – “who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test.”

(d) Single-Area Requirements

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must also include:

- (1) Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)*
- (2) The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)*
- (3) The type and availability of WIOA title I Youth activities, including an identification of successful providers of such activities. (WIOA section 108(b)(9).)*

(1) Public Comments

Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)

To be determined.

(2) Entity Responsible for Disbursal of Grant Funds

The entity responsible for the disbursal of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)

Not applicable. The Idaho Department of Labor is the entity responsible for the disbursal of grant funds.

(3) Youth Activities and Providers

The type and availability of WIOA title I Youth activities, including an identification of successful providers of such activities. (WIOA section 108(b)(9).)

The Workforce Development Council has determined that the fiscal agent the Idaho Department of Labor will administer the framework activities: intake, objective assessments and development of individual service strategy, case management and follow-up services. The Workforce Development Council is currently identifying the request for proposal criteria for contracting with eligible providers of youth activities.

WIOA YOUTH PROGRAM DESIGN

1. Tutoring, study skills training, instruction and evidence-based dropout prevention strategies
AVAILABLE IN ALL COMMUNITIES
2. Alternative secondary school offerings or dropout recovery services
AVAILABLE IN ALL COMMUNITIES
3. Paid/unpaid work experiences, including summer employment opportunities, pre-apprenticeship programs, internships and job shadowing and on-the-job training.
LIMITED IN ALL COMMUNITIES
Opportunities broaden when economy is on up-swing, however not necessarily linked to academic/occupational training; opportunities further limited by participant barriers
4. Occupational skill training
PELL GRANTS AVAILABLE BUT LIKELY NOT AVAILABLE WITHOUT WIOA RESOURCES
5. Education offered concurrently with workforce preparation/training
SEE #3 ABOVE
6. Leadership development opportunities, which include community service and peer-centered activities encouraging responsibility and other positive social behaviors
HISTORICALLY INTERTWINED WITH WORK-LEARNING
7. Supportive services
COLLABORATING W/OTHER ORGANIZATIONS, HOWEVER NOT ALL NEEDS COVERED
8. Adult mentoring
NOT AVAILABLE IN APPROX ½ OF COMMUNITIES
9. Follow-up services for a minimum of 12 months after last program activity
To be administered by the Idaho Department of Labor
10. Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals
AVAILABLE IN ALL COMMUNITIES
11. Financial literacy education
PHYSICALLY AVAILABLE IN MOST COMMUNITIES. INTERNET EDUCATION AVAILABLE.
12. Entrepreneurial skills training
INTERNET EDUCATION AVAILABLE.

13. Labor Market Information

AVAILABLE IN ALL COMMUNITIES

14. Transition activities to post-secondary education/training

HISTORICALLY WOVEN INTO SERVICES TO YOUTH THAT ARE PLANNING TO ENTER THOSE AREAS

(e) Waiver Requests (optional)

In States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

- (1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;*
- (2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;*
- (3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;*
- (4) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;*
 - (A) supporting employer engagement;*
 - (B) connecting education and training strategies;*
 - (C) supporting work-based learning;*
 - (D) improving job and career results, and*
 - (E) other guidance issued by the Department.*
- (5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and*
- (6) Describes the processes used to:*
 - (A) Monitor the progress in implementing the waiver;*
 - (B) Provide notice to any local board affected by the waiver;*
 - (C) Provide any local board affected by the waiver an opportunity to comment on the request;*
 - (D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver.*
 - (E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.*
- (7) The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.*

Waiver Request #1 - SINGLE STATEWIDE COUNCIL SERVING STATEWIDE REGIONAL PLANNING AREA

- (1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;*

The State of Idaho is formally seeking a waiver to permit a state board to carry out the functions of a local board. This waiver request is for a renewal of a waiver previously applied to 20 CFR 661.300(f) which permits a state board to carry-out the roles of a local board in a single local area to a statewide regional planning area. The Workforce Innovation and Opportunity Act Sections 106(d)(2) and 107(c)(4) direct a state board for a single state local area to carry out the functions of the local board. The Workforce Development Council has acted as both the state and local board under WIA since 2005 and the current structure is reflected in the Combined State Plan.

- (2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;*

No state or local policies limit the Governor's authority to require a regional plan or utilize the Workforce Development Council as the local workforce board for the Idaho Workforce Consortium.

(3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

The primary goal to be achieved by this waiver is to reduce annual overhead and maximize the available money directed to training and services to business. The programmatic outcome is to serve a larger number of participants than would otherwise be served due to added administrative costs. To maximize resources available for service delivery, the state continued to use the Workforce Development Council as the local workforce board throughout the state. This saved the WIA program in the state approximately \$1.5 million dollars by removing the administrative overhead of maintaining six regions throughout the state. Since then, these former administrative funds have been utilized as program funds allowing for more participants to be served.

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead, maximizing the available money directed to training and services to business and job seekers.

The State has set a goal of spending 50 percent of WIOA local Adult and Dislocated Worker funds for direct training and support of businesses and participants, positively impacting achievement of performance goals.

This statewide structure enhances efforts to transform the system into a demand driven system. The 25 Idaho Department of Labor offices across the state serve as the state's American Job Centers offering the full range of workforce development services. This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.

The single statewide structure has strengthened administrative oversight and accountability processes. Prior to this change, administrative deficiencies resulted in substantial disallowed costs for Idaho's largest Workforce Investment Area. The strengthened administrative structure, under the waiver, has assisted Idaho to avoid future disallowed costs and will continue to do so, thus further enabling the redirection of funds from service provider and administration to direct participant training and support.

(4) Describes how the waiver will align with the Department's policy priorities, such as:
(A) supporting employer engagement;

Additional funds will be available to support statewide activities supporting employer engagement.

(B) connecting education and training strategies;

The current Workforce Development Council has been in place since the Jobs Training Partnership Act. The Presidents of the community colleges in the state, the Superintendent of Public Instruction and the Executive Director of the Office of the State Board of Education are all required members of the state Workforce Development Council. State education policy is thoroughly aligned with workforce development goals.

(C) supporting work-based learning;

Additional funds will be available to support statewide activities supporting employer engagement.

(D) improving job and career results, and

Additional funds will be available to support statewide activities supporting employer engagement.

(E) other guidance issued by the Department.

Not applicable.

5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment;

The change to a single statewide regional planning structure, in conjunction with this waiver, has allowed for an average annual increase in training opportunities for more adults, dislocated workers and at-risk youth, and

has since permitted the state to maintain service levels despite funding cuts over the years.

(6) Describes the processes used to:

(A) Monitor the progress in implementing the waiver;

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead, maximizing the available money directed to training and services to business and job seekers. The State has set a goal of spending 50 percent of WIOA local Adult and Dislocated Worker funds for direct training and support of businesses and participants, positively impacting achievement of performance goals. That ratio of direct training funds is regularly monitored to ensure that direct participant funding does not drop below 50% of the funds.

The single statewide structure has strengthened administrative oversight and accountability processes. Prior to this change, administrative deficiencies resulted in substantial disallowed costs for Idaho's largest Workforce Investment Area. The strengthened administrative structure, under the waiver, has assisted Idaho to avoid future disallowed costs and will continue to do so, thus further enabling the redirection of funds from service provider and administration to direct participant training and support.

(B) Provide notice to any local board affected by the waiver;

No local boards are affected by the waiver.

(C) Provide any local board affected by the waiver an opportunity to comment on the request;

No local boards are affected by the waiver.

(D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

Originally this waiver was announced to the general public as part of the PY05 plan review process which included a process for soliciting review and comment during a three-week period and review by the state's Workforce Development Council, which included comments from the existing Local Workforce Investment Boards and their staff.

This request for waiver extension was posted at <http://www.labor.idaho.gov> for public review from June 17 – July 13, 2015. No public comments were received. The State Workforce Development Council, which includes representatives for both business and organized labor, approved the request for submission of a waiver extension on July 13, 2015. The meeting was announced and opened to the public.

(E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.

The waiver outcomes will be collected and reported in the State's WIOA Annual Report.

(7) The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

Not applicable.

Waiver Request #2 - REQUIRED EVALUATIONS OF WORKFORCE INVESTMENT ACTIVITIES

(1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;

The state of Idaho respectfully requests a waiver of the following two sections of the Workforce Innovation and Opportunity Act concerning required activities funded by Governor's Reserve funds: completion of

evaluations on workforce investment activities for adults, dislocated workers, and youth (WIOA Section 134(a)(2)(B)(vi)), WIOA Section 129(b)(1)(A).)

The Combined WIOA State Plan indicates that it will use the statutory performance measures to evaluate the effectiveness of the programs.

(2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

No state statutory or regulatory barriers exist at this time.

(3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

Congressional action has decreased the percentage of Governor's Reserve funding for states from 15 percent down to 10 percent. Furthermore, Idaho's base funding has decreased \$1.4 million from PY 2014 to PY 2015. The total amount available for the Governor's Reserve in PY 2015 is \$864,727, down from \$879,192 in PY 2014. Consequently, funding has become severely limited while the costs of operating the state's workforce development/One-Stop system and the other mandatory WIOA activities continue to rise, further restricting Idaho's ability to effectively fund and carry-out all of the required statewide workforce investment activities. The current funding level for this program year and anticipated funding levels for future program years are insufficient to cover the costs of conducting evaluations.

With this waiver, Governor's Reserve funding will be used to enhance those primary and basic functions of the system. The state's reduced funds are being used for the following required activities:

- Submitting required reports
- Disseminating and making available the state's list of WIOA Eligible Training Providers;
- Carrying out statewide Rapid Response activities;
- Providing technical assistance to workforce areas;
- Assisting in the establishment and operation of the state's One-Stop delivery system;
- Operating fiscal and management accountability information systems; and
- Carrying out monitoring and oversight of employment and training activities

The state's goal in seeking this waiver is to ensure that the state prioritize the use of the Governor's Reserve funds for the required WIOA activities deemed most essential to the basic functions of the state's workforce development system.

(4) Describes how the waiver will align with the Department's policy priorities, such as:

(A) supporting employer engagement;

Additional funds will be available to support statewide activities supporting employer engagement.

(B) connecting education and training strategies;

Additional funds will be available to support statewide activities supporting employer engagement.

(C) supporting work-based learning;

Additional funds will be available to support statewide activities supporting employer engagement.

(D) improving job and career results, and

Additional funds will be available to support statewide activities supporting employer engagement.

(E) other guidance issued by the Department.

Not applicable.

5) Describes the individuals affected by the waiver, including how the waiver will impact services for

disadvantaged populations or individuals with multiple barriers to employment; and

The ability to maintain, rather than reduce, the current levels of service is important and extremely valuable. This waiver will provide the state with more flexibility in directing Governor's Reserve funds to those activities that best preserve basic functions of the statewide workforce development system and ensure current service levels are maintained.

(6) Describes the processes used to:

(A) Monitor the progress in implementing the waiver;

Monitoring the statutory performance measures will allow evaluation of the effectiveness of the program. If Idaho were not to meet or exceed its statutory performance measures, additional evaluation of the programs may be necessary.

(B) Provide notice to any local board affected by the waiver;

No local boards are affected by the waiver.

(C) Provide any local board affected by the waiver an opportunity to comment on the request;

No local boards are affected by the waiver.

(D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

This request for waiver was posted at <http://www.labor.idaho.gov> for public review from June 17 – July 13, 2015. No public comments were received. The State Workforce Development Council, which includes representatives for both business and organized labor, approved the request for submission of a waiver extension on July 13, 2015. The meeting was announced and opened to the public.

(E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.

The waiver outcomes, in the form of performance goals and standards, will be reported in the State's WIOA Annual Report.

(7) The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

Not applicable.

Waiver Request #3 - PROVISION OF ADDITIONAL ASSISTANCE TO AREAS WITH HIGH CONCENTRATION OF ELIGIBLE YOUTH

(1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;

The State of Idaho respectfully requests a waiver for the provision of additional assistance to workforce areas that have high concentrations of eligible youth (WIOA Section 129(b)(1)(F)). The Combined State Plan already contains an allocation formula to provide proportionate funding to areas with high concentrations of eligible youth.

(2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

(3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

Congressional action has decreased the percentage of Governor's Reserve funding for states from 15 percent down to 10 percent. Furthermore, Idaho's base funding has decreased \$1.4 million from PY 2014 to PY 2015. The total amount available for the Governor's Reserve in PY 2015 is \$864,727, down from \$879,192 in PY 2014. Consequently, funding has become severely limited while the costs of operating the state's workforce development/One-Stop system and the other mandatory WIOA activities continue to rise, further restricting Idaho's ability to effectively fund and carry-out all of the required statewide workforce investment activities.

Based on the formula allocation factor that allocates one-third of program funds on the basis of relative number of disadvantaged youth, this funding is already directed at workforce areas with high concentrations of eligible youth. The Workforce Development Council allotted \$2.8 million in WIOA youth funds to support services for eligible youth.

Providing additional assistance to areas with high concentrations of disadvantaged youth would further decrease an already severely impacted budget designated to support these activities. The state's reduced funds are being used for the following required activities:

- Carrying out statewide Rapid Response activities;
- Submitting required reports;
- Disseminating and making available the state's list of WIA Eligible Training Providers;
- Providing technical assistance to workforce areas;
- Assisting in the establishment and operation of the state's One-Stop delivery system;
- Operating fiscal and management accountability information systems; and
- Carrying out monitoring and oversight of employment and training activities

The state's goal in seeking this waiver extension is to ensure that the state prioritize the use of the Governor's reserve funds for the required WIOA activities deemed most essential to the basic functions of the state's workforce development system.

(4) Describes how the waiver will align with the Department's policy priorities, such as:

(A) supporting employer engagement;

Additional funds will be available to support statewide activities supporting employer engagement.

(B) connecting education and training strategies;

Additional funds will be available to support statewide activities supporting employer engagement.

(C) supporting work-based learning;

Additional funds will be available to support statewide activities supporting employer engagement.

(D) improving job and career results, and

Additional funds will be available to support statewide activities supporting employer engagement.

(E) other guidance issued by the Department.

5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment;

This waiver will provide the state with more flexibility in directing governor's reserve funds to those activities that best preserve basic functions of the statewide Workforce Development system. The state does not believe that this waiver will comprehensively affect any services provided to WIOA participants throughout Idaho.

(6) Describes the processes used to:

(A) *Monitor the progress in implementing the waiver;*

Under Idaho's WIOA youth policy, there is a target of serving eligible youth in portion to their incidence in the population. The progress on this target will be monitored along with other regular performance reports.

(B) *Provide notice to any local board affected by the waiver;*

No local boards are affected by the waiver.

(C) *Provide any local board affected by the waiver an opportunity to comment on the request;*

No local boards are affected by the waiver.

(D) *Ensure meaningful public comment, including comment by business and organized labor, on the waiver.*

This request for waiver was posted at <http://www.labor.idaho.gov> for public review from June 17 – July 13, 2015. No public comments were received. The State Workforce Development Council, which includes representatives for both business and organized labor, approved the request for submission of a waiver extension on July 13, 2015. The meeting was announced and opened to the public.

(E) *Collect and report information about waiver outcomes in the State's WIOA Annual Report.*

The waiver outcomes will be reported in the State's WIOA Annual Report.

(7) *The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.*

Not applicable.

(N/A) Title I-B Assurances

The State Plan must include assurances that:	
1.	The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of career and training services to individuals who are low income, public assistance recipients or basic skills deficient;
	<i>The State has implemented its policies regarding priority of selection and priority of service to individuals who are low income, public assistance recipients or basic skills deficient for the Adult program, which are reflected in career planner's Technical Assistance Guide.</i>
2.	The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;
	<i>As the administrator of the JVSG program, the Idaho Department of Labor has established policy and processes to ensure continual cross-training of all intake/assessment staff in the One Stop system for immediate referral of veterans with significant barriers to the Disabled Veterans' Outreach Program (DVOP) specialist staff.</i>

3.	The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;
	<i>The State has a written policy and procedure that set forth criteria to be used by chief local elected officials for the appointment of local workforce investment board members in compliance with WIOA Section 107(b)(2).</i>
4.	The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);
	<i>The State has written policy and procedures for certification, recertification and decertification of local workforce boards.</i>
5.	Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;
	<i>The Idaho Workforce Development Council has served as State Workforce Board since JTPA. The Council's bylaws prescribe the legal requirements for membership and a written policy has been approved and circulated that demonstrates the Workforce Development Council meets the criteria for an alternate entity under WIOA section 101(e) and is substantially similar to WIOA sections (a),(b), and (c).</i>
6.	The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;
	<i>The State has established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions.</i>
7.	The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);
	<i>The State assures it will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). This policy is reflected in the state's WIOA Provisions and Assurances.</i>
8.	The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;
	<i>The State assures its distribution of adult, dislocated and youth funds received under WIOA is equitable throughout the State, and that no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. The State has adopted the federal distribution formula, along with its hold harmless and stop-gap processes to distribute resources.</i>
9.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-

	Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;
	<i>As reflected in this State Plan, the Idaho Division of Vocational Rehabilitation, and the Commission for the Blind & Visually Impaired Rehabilitation Services which administer State laws for vocational rehabilitation of persons with disabilities, fully cooperates with the Idaho Department of Labor, which administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I.</i>
10.	Priority of Service for covered persons is provided for each of the Title I programs; and
	<i>The State assures that Veterans Priority of Service for veterans and other covered persons is provided for each of the Title I programs.</i>
11.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
	<i>The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.</i>
12.	The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);
	<i>The state has taken appropriate action (established fiscal controls, uniform administrative requirements, monitoring, and sanctions policies) to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3).</i>